IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

Civil Action No. 04-343 (JJF)

TATUNG CO.; TATUNG COMPANY OF AMERICA, INC.; and VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

FILED UNDER SEAL SUBJECT TO PROTECTIVE ORDER

DECLARATION OF CORMAC T. CONNOR, ESQ. IN SUPPORT OF PLAINTIFF LG. PHILIPS LCD CO., LTD.'S RESPONSE TO TATUNG DEFENDANTS' OBJECTIONS TO SPECIAL MASTER REPORT AND RECOMMENDATIONS REGARDING (A) LG. PHILIPS' LCD CO., LTD.'S MOTION TO COMPEL TATUNG DEFENDANTS TO PROVIDE DISCOVERY ON ADVICE OF COUNSEL AND DUTY OF CARE; AND (B) THE TATUNG DEFENDANTS' CROSS-MOTION TO BIFURCATE DISCOVERY

June 12, 2007

THE BAYARD FIRM

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 12, 2007, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent by email on June 12, 2007 and will be sent by hand to the above counsel on May 17, 2007, and were sent by email on June 12, 2007, and will be sent by first class mail onMay 17, 2007, to the following non-registered participants:

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